

SHER TREMONTÉ LLP

December 1, 2015

BY CM/ECF

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11216

Re: *United States v. Hurant*, 15-mj-780

Dear Judge Mann:

I write on behalf of my client, Jeffrey Hurant, to respectfully renew Mr. Hurant's November 30, 2015 request that his release travel restrictions be modified to allow him to travel within the continental United States.

On or about August 25, 2015, Mr. Hurant was arrested in the Eastern District of New York in connection with this matter. On the same day he was arrested, Mr. Hurant was released on a \$350,000 bond, and his travel was restricted to New York City, Long Island, and New Jersey. The Court previously modified Mr. Hurant's travel restrictions to allow him to travel to Massachusetts. On November 30, 2015, Mr. Hurant filed a second application for modification of his travel restrictions. The Court denied the application without prejudice to renew the request with written consent from the surety on the bond. Appended to this renewed request is a letter from Mr. Hurant's surety consenting to the modification.

We respectfully request that Your Honor modify Mr. Hurant's travel restrictions to allow him to travel within the continental United States. In the near term, Mr. Hurant hopes to travel to San Francisco to visit relatives, and is planning additional travel in early 2016 for job interviews.

I previously discussed this matter with Assistant U.S. Attorney Tyler Smith and U.S. Pretrial Services Officer Ashley Calvi. AUSA Smith consents to the requested travel modification. Officer Calvi advises that Pretrial Services is neutral on the request and that Mr. Hurant is in full compliance with all conditions of release. If this request is approved, Mr. Hurant will provide Pretrial Services with itineraries for any travel.

Respectfully submitted,

/s/  
Noam Biale (NB-8072)

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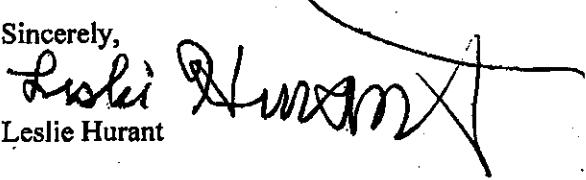
Re: *United States v. Jeffrey Hurant, 15-mj-780*

Dear Judge Mann:

I am the father of Jeffrey Hurant and the surety on his release bond. I am aware that Jeffrey has requested the Court's permission to travel, and I have reviewed the request prepared by Jeffrey's lawyers. Jeffrey's lawyers have also informed me that the Court denied Jeffrey's request because it did not indicate whether or not the surety consented to the request. I am therefore writing to let you know that I consent to the modification of the conditions of Jeffrey's pre-trial release and his request to travel.

Thank you for your consideration.

Sincerely,

  
Leslie Hurant

**CERTIFICATE OF ACKNOWLEDGMENT**

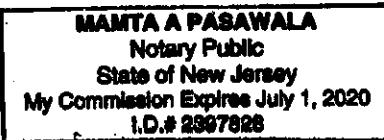
State of New Jersey )  
County of Morris ) ss

On 1 Dec 2015 before Mamta Pasawala, Notary Public in and for  
(Notary's Name)  
said county, personally appeared Leslie Hurant \_\_\_\_\_ and  
(Signer/Witness) (Signer/Witness)

(Signer/Witness)  
who has/have satisfactorily identified him/her/themselves as the signer(s)  
or/witness(es) to the above-referenced document.

(Affix Notary Stamp Here)  
My Commission Expires

Mamta Pasawala  
(Notary Signature) (Date)



*12/1/15*